

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

WASHINGTON MUTUAL BANK,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. 05-11686
)	
DAN W. ADAMS, HEIDI K. ADAMS,)	
UNITED STATES OF AMERICA,)	
COMMONWEALTH OF)	
MASSACHUSETTS DEPARTMENT OF)	
REVENUE, DELTA FUNDING)	
CORPORATION and BENEFICIAL)	
MASSACHUSETTS INC.,)	
)	
Defendants.)	
)	

REQUEST FOR DEFAULT

I, Mary Ellen Manganelli, attorney for the above-named plaintiff, Washington Mutual Bank, (“Washington Mutual”), pursuant to Fed. R. Civ. P. 55, state that the Complaint in which a judgment for affirmative relief is sought against the defendant, Delta Funding Corporation, herein, was filed on August 15, 2005. The summons and a copy of the complaint was served on Delta Funding Corporation on August 19, 2005, as appears from the officer’s return filed with this court. The time within which the Delta Funding Corporation was granted to serve a responsive pleading, or otherwise defend, has expired and Delta Funding Corporation herein has failed to serve or file an answer or otherwise defend the Complaint.

WHEREFORE, Plaintiff makes application that Delta Funding Corporation be defaulted.

Respectfully Submitted,

WASHINGTON MUTUAL BANK,
By its attorneys,

/s/ Mary Ellen Manganelli
Donn A. Randall (BBO #631590)
J. Patrick Kennedy (BBO #565778)
Mary Ellen Manganelli (BBO #641658)
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Dated: September 9, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the defendant, Delta Funding Corporation by mail on September 9, 2005.

/s/ Mary Ellen Manganelli
Mary Ellen Manganelli